

**Thomas & Solomon PLLC**  
THE EMPLOYMENT ATTORNEYS

September 30, 2024

VIA CM/ECF

Honorable Elizabeth A. Wolford  
United States District Court  
Western District of New York  
100 State Street  
Rochester, NY 14614

Re: Van Brunt-Piehler v. Absolute Software, Inc. et al.  
Civil Action No. 16-cv-6313-EAW-MWP

Dear Judge Wolford:

We represent the Plaintiff in the above-referenced action. As the Court is aware, Defendants filed a Bill of Costs on September 12, 2024. *See* Dkt. 428. Accordingly, under Local Rule 54(b), Plaintiff's opposition to the taxation of costs is currently due on October 3, 2024.

Plaintiff respectfully requests that the Court extend the time for Plaintiff to file her opposition to Defendants' Bill of Costs by two weeks, thus making the new deadline, up to and including, October 17, 2024. The requested is necessitated because one of the attorneys in Plaintiff counsel's firm recently left the firm, and the undersigned counsel is currently in the process of transitioning onto numerous matters, as well as a number of preexisting deadlines and obligations in other cases. The requested extension also will have no impact on any other deadlines. Accordingly, there is good cause for the requested extension.

Prior to filing this request, Plaintiff's counsel reached out to counsel for Defendants regarding the requested extension, who indicated that they did not object to the requested extension.

If this request meets with your approval, a so-ordered line is included herein for your convenience.

Respectfully submitted,

/s/ Jonathan W. Ferris

Jonathan W. Ferris

cc: All counsel of record (via CM/ECF)

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**SO ORDERED:**

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Honorable Elizabeth A. Wolford

United States District Judge

Dated: \_\_\_\_\_, 2024